

EXHIBIT 11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAFAEL FOX, PAUL D'AURIA, and JILL SHWINER,

Plaintiffs,

-against-

STARBUCKS CORPORATION d/b/a
STARBUCKS COFFEE COMPANY,

Defendant.

Case No. 19-CV-4650 (AJN)

STIPULATION

Defendant Starbucks Corporation d/b/a Starbucks Coffee Company (“Starbucks”) hereby states the following¹:

1. Starbucks did not consult with any experts for purposes of issuing its public statement on May 21, 2019.
2. Rather, in February 2019, Starbucks’ outside litigation counsel retained Exponent, Inc., an engineering and scientific consulting firm, as a consulting expert in anticipation of litigation and to assist counsel in the defense of claims that Plaintiffs had asserted prior to the filing of the Complaint in this action.
3. Starbucks did not retain Exponent for the purposes of issuing any public statement, as no press inquiry had been made at the time of the February 2019 retention and the parties were engaged in confidential pre-litigation discussions.
4. Exponent was not involved in drafting the May 21, 2019 press statement.

¹ The statements contained in the instant stipulation are without waiver of the attorney-client privilege and/or work product doctrine.

5. Further, Exponent was not asked to issue a written report prior to May 21, 2019, and no draft or final report has been issued to date.

Date: October 27, 2020
New York, New York

s/A. Michael Weber

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